

00961 - H10

**IN THE COURT OF COMMON PLEAS OF FRANKLIN COUNTY, OHIO**

**MICHAEL J. YOUNG  
610 Old Farm Road  
Columbus, Ohio 43213**

**Plaintiff,**

**Vs.**

**COMPLAINT FOR RELIEF  
AND MONETARY DAMAGES**

**JURY DEMAND ENDORSED**

**LEXISNEXIS  
DIVISION OF RELX PLC  
230 Park Avenue – Floor 7  
New York, New York 10169**

**EQUIFAX CREDIT INFORMATION SERVICES, INC.  
1550 Peachtree Street NW  
Atlanta, Georgia 30309**

**EXPERIAN INFORMATION SOLUTIONS, INC.  
29 Broadway  
Sixth Floor  
New York, New York 10009**

**TRANSUNION INTERMEDIATE HOLDINGS, INC.  
555 W. Adams Street  
Chicago, Illinois 60661**

**Defendants.**

**COMPLAINT**

**Background Information**

**Plaintiff Michael J. Young (hereinafter “Young”) is an individual residing in Columbus, Ohio and is involved in various business activities whereby he seeks financing and credit from Banks, Lenders and other entities.**

**Defendants RELX PLC LexisNexis (hereinafter “LexisNexis”), Equifax Credit Information Services, Inc. (hereinafter “Equifax”), Experian Information Solutions, Inc. (hereinafter “Experian”) and TransUnion Intermediate Holdings, Inc. (hereinafter “TransUnion”) supply credit and legal research information data to Banks, Lenders and other credit granting entities.**

**PARTIES**

1. Plaintiff is an Ohio resident residing at 610 Old Farm Road in Columbus, Ohio.
2. Defendants RELX PLC LexisNexis, Equifax Credit Information Services, Inc., Experian Information Solutions, Inc. and TransUnion Intermediate Holdings, Inc. are entities that do business in the State of Ohio and are duly qualified to do business in Ohio.

**JURISDICTION AND VENUE**

3. The Court has jurisdiction over this action pursuant to O.R.C. 2305.01.
4. Venue is proper pursuant to the Ohio Rules of Civil Procedure Sections 3(B)(3) and 3(B)(6) among others.

**COUNT I**

5. RELX PLC LexisNexis (hereinafter "LexisNexis") has reported erroneous information on Plaintiff Michael J. Young (hereinafter "Young") to Equifax Credit Information Services, Inc. (hereinafter "Equifax") and Experian Information Solutions, Inc. (hereinafter "Experian") and TransUnion Intermediate Holdings, Inc. (hereinafter "TransUnion"). Said erroneous information includes the following items:
  - a) United States Bankruptcy Court-Southern District Of Ohio Case No. 15-54075, wherein LexisNexis reported that the Petitioner was Plaintiff Young as a "Personal Filer" instead of his status in the filing only in his capacity as a "Trustee". LexisNexis has erroneously reported to Equifax, Experian and TransUnion that this filing was a "Personal Bankruptcy" of Young and,

thereafter, Equifax, Experian and TransUnion issued credit reports noting that this was a "personal Bankruptcy" of Young.

b) United States Bankruptcy Court-Southern District Of Ohio Case No.15-57653, wherein LexisNexis reported that the Petitioner was Plaintiff Young as a "Personal Filer" instead of his status in the filing only in his capacity as a "Trustee". LexisNexis has erroneously reported to Equifax, Experian and TransUnion that this filing was a "Personal Bankruptcy" of Young and, thereafter, Equifax, Experian and TransUnion issued credit reports noting that this was a "personal Bankruptcy" of Young.

c) United States Bankruptcy Court-Southern District Of Ohio Case No. 16-53726, wherein LexisNexis reported that the Petitioner was Plaintiff Young as a "Personal Filer" instead of his status in the filing only in his capacity as a "Trustee". LexisNexis has erroneously reported to Equifax, Experian and TransUnion that this filing was a "Personal Bankruptcy" of Young and, thereafter, Equifax, Experian and TransUnion issued credit reports noting that this was a "personal Bankruptcy" of Young.

d) A Federal Tax Lien filed In Fairfield County, Ohio, Lien No. 201500006068, in the amount of \$53,467, filed of record in April, 2015 and still valid. LexisNexis has erroneously reported to Equifax, Experian and TransUnion that this lien is still of record and not released, and, thereafter, Equifax, Experian and TransUnion issued credit reports noting that this was an "unpaid tax lien" of Young and still of record.

e) A Federal Tax Lien filed In Franklin County, Ohio, Lien No. 201509101286, in the amount of \$20,796, filed of record in September, 2015 and still valid. LexisNexis has erroneously reported to Equifax, Experian and TransUnion

that this lien is still of record and not released, and, thereafter, Equifax, Experian and TransUnion issued credit reports noting that this was an “unpaid tax lien” of Young and still of record.

6. Defendant Young has repeatedly contacted LexisNexis, by telephone conversations and in writing, about the error in reporting these items set forth in a, b, c, d and e above, and other erroneous information, to Equifax, Experian and TransUnion. LexisNexis has refused to correct its erroneous reporting and continues to report, in a “reckless” and “arrogant” manner, this incorrect information, in deference to Plaintiff Young’s requests for corrections. The reporting and issuance of this erroneous information has damaged the reputation of Plaintiff Young and his ability to get credit from Banks and Lenders.

## COUNT II

7. Plaintiff Young hereby incorporates and restates the above paragraphs as if fully rewritten herein.
8. Defendant Equifax has used the erroneous information from LexisNexis on credit reports it has issued on Plaintiff Young, and Young has repeatedly contacted Equifax, in writing and by e-mail correspondence, about the error in reporting this erroneous and incorrect information. Equifax has refused to correct its erroneous reporting and continues to report, in a “reckless” and “arrogant” manner, this incorrect information, in deference to Plaintiff Young’s requests for corrections. The reporting and issuance of this erroneous information by Equifax has damaged the reputation of Plaintiff Young and his ability to get credit from Banks and Lenders.

9. In addition to the tortious behavior by Defendant Equifax set forth above, Equifax has issued credit information and a 'credit score' or 'credit rating' on Plaintiff Young to various companies that make loans or advance credit to individuals such as Young. Except for some written authorizations given by Young for specific credit applications, Young has never authorized Equifax to issue any credit report or rating of his credit to any entity or individual. This reporting of Plaintiff Young's credit history and a rating, whether accurate or erroneous, is illegal and an 'invasion of privacy' of Young's rights, both under Ohio and United States law, and the issuance of said reports and ratings have damaged Young and his ability to do business.

### COUNT III

10. Plaintiff Young hereby incorporates and restates the above paragraphs as if fully rewritten herein.
11. Defendant Experian has used the erroneous information from LexisNexis on credit reports it has issued on Plaintiff Young, and Young has contacted Experian about the error in reporting this erroneous and incorrect information. Experian has refused to correct its erroneous reporting and continues to report, in a "reckless" and "arrogant" manner, this incorrect information, in deference to Plaintiff Young's requests for corrections. The reporting and issuance of this erroneous information by Experian has damaged the reputation of Plaintiff Young and his ability to get credit from Banks and Lenders.
12. In addition to the tortious behavior by Defendant Experian set forth above, Experian has issued credit information and a 'credit score' or 'credit rating' on Plaintiff Young to various companies that make loans or advance credit to individuals such as Young. Except for some written authorizations given by Young for specific credit

applications, Young has never authorized Experian to issue any credit report or rating of his credit to any entity or individual. This reporting of Plaintiff Young's credit history and a rating, whether accurate or erroneous, is illegal and an 'invasion of privacy' of Young's rights, both under Ohio and United States law, and the issuance of said reports and ratings have damaged Young and his ability to do business.

#### COUNT IV

13. Plaintiff Young hereby incorporates and restates the above paragraphs as if fully rewritten herein.

14. Defendant TransUnion has used the erroneous information from LexisNexis on credit reports it has issued on Plaintiff Young, and Young has repeatedly contacted TransUnion, in writing and by e-mail correspondence, about the error in reporting this erroneous and incorrect information. TransUnion has refused to correct its erroneous reporting and continues to report, in a "reckless" and "arrogant" manner, this incorrect information, in deference to Plaintiff Young's requests for corrections. The reporting and issuance of this erroneous information by TransUnion has damaged the reputation of Plaintiff Young and his ability to get credit from Banks and Lenders.

15. In addition to the tortious behavior by Defendant TransUnion set forth above, TransUnion has issued credit information and a 'credit score' or 'credit rating' on Plaintiff Young to various companies that make loans or advance credit to individuals such as Young. Except for some written authorizations given by Young for specific credit applications, Young has never authorized TransUnion to issue any credit report or rating of his credit to any entity or individual. This reporting of Plaintiff Young's credit history and a rating, whether accurate or erroneous, is illegal and an 'invasion

of privacy' of Young's rights, both under Ohio and United States law, and the issuance of said reports and ratings have damaged Young and his ability to do business.

WHEREFORE, Plaintiff Michael J. Young demands judgment against Defendants RELX PLC LexisNexis, Equifax Credit Information Services, Inc., Experian Information Solutions, Inc. and TransUnion Intermediate Holdings, Inc., jointly and severally, and for the relief as follows:

A. As to Count I, an Order of the Court that i) directs LexisNexis to delete all information as set forth in Paragraphs 5. a), b), c), d) and e) of this Complaint as to erroneous information it is reporting; ii) to notify Defendants Equifax, Experian and TransUnion to delete this erroneous information from all credit reports of Plaintiff Young; iii) to issue a letter of correction directed to all entities that Plaintiff Young provides to LexisNexis regarding said erroneous information as set forth in said Paragraphs 5. a), b), c), d) and e) of this Complaint ; iv) for a monetary judgment against LexisNexis in favor of Plaintiff Young for compensatory damages in the amount of \$500,000.00 and for a monetary judgment against LexisNexis in favor of Plaintiff Young for punitive damages in the amount of \$1,500,000.00.

B. As to Count II, an Order of the Court that i) directs Equifax to delete all information as set forth in Paragraphs 5. a), b), c), d) and e) of this Complaint as to erroneous information it is reporting in credit reports on Plaintiff Young; ii) to issue a letter of correction directed to all entities that Plaintiff Young provides to Equifax regarding said erroneous information as set forth in said Paragraphs 5. a), b), c), d) and e) of this Complaint; iii) to refrain from issuing to any person or entity, without the express consent of Plaintiff Young, any and all credit



reports, credit ratings and credit scores regarding Plaintiff Young, and; iv) for a monetary judgment against Equifax in favor of Plaintiff Young for compensatory damages in the amount of \$500,000.00 and for a monetary judgment against Equifax in favor of Plaintiff Young for punitive damages in the amount of \$1,500,000.00.

C. As to Count III, an Order of the Court that i) directs Experian to delete all information as set forth in Paragraphs 5. a), b), c), d) and e) of this Complaint as to erroneous information it is reporting in credit reports on Plaintiff Young; ii) to issue a letter of correction directed to all entities that Plaintiff Young provides to Experian regarding said erroneous information as set forth in said Paragraphs 5. a), b), c), d) and e) of this Complaint; iii) to refrain from issuing to any person or entity, without the express consent of Plaintiff Young, any and all credit reports, credit ratings and credit scores regarding Plaintiff Young, and; iv) for a monetary judgment against Experian in favor of Plaintiff Young for compensatory damages in the amount of \$500,000.00 and for a monetary judgment against Experian in favor of Plaintiff Young for punitive damages in the amount of \$1,500,000.00.

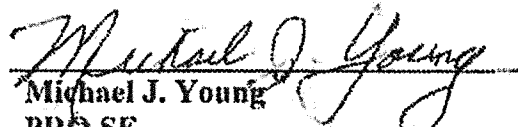
D. As to Count IV, an Order of the Court that i) directs TransUnion to delete all information as set forth in Paragraphs 5. a), b), c), d) and e) of this Complaint as to erroneous information it is reporting in credit reports on Plaintiff Young; ii) to issue a letter of correction directed to all entities that Plaintiff Young provides to TransUnion regarding said erroneous information as set forth in said Paragraphs 5. a), b), c), d) and e) of this Complaint; iii) to refrain from issuing to any person or entity, without the express consent of Plaintiff Young, any and all credit reports, credit ratings and credit scores regarding Plaintiff Young, and;



iv) for a monetary judgment against TransUnion in favor of Plaintiff Young for compensatory damages in the amount of \$500,000.00 and for a monetary judgment against TransUnion in favor of Plaintiff Young for punitive damages in the amount of \$1,500,000.00.

E. Payment of all of Plaintiff Young's attorney fees, court costs and any and all of his expenses related to this action. And,

F. For such other legal and equitable relief to which Plaintiff Young may be entitled.

  
Michael J. Young  
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